

# Glenn Research Center, Environmental Programs Manual

## Chapter 20 - EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

**NOTE:** The current version of this Chapter is maintained and approved by the Environmental Management Office (EMO). The revision date for this chapter is December 2003. If you are referencing paper copies, please verify that it is the most current version before use. The current version is maintained on the Glenn Research Center intranet at <http://osat-ext.grc.nasa.gov/emo/pub/epm/epm-contents.pdf>. Approved by: EMO Chief, Michael Blotzer {[mailto: Michael.J.Blotzer@nasa.gov](mailto:Michael.J.Blotzer@nasa.gov)}.

### PURPOSE

The Emergency Planning and Community Right-To-Know Act (EPCRA) was enacted in October 1986 in response to growing concern about the effect of chemical releases on communities. Although enacted as part of the Superfund Amendments and Reauthorization Act of 1986 (SARA Title III), EPCRA is a freestanding law. It is intended to encourage and support emergency planning efforts at the State and local level and to provide citizens and local governments with information concerning potential chemical hazards present in their communities.

This chapter conforms to the Glenn Research Center's Environmental Management System (GRC EMS) as defined in Chapter 1. This chapter supports the GRC Environmental Policy, promoting pollution prevention, regulatory compliance and continuous improvement.

### REGULATIONS

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980
- Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986
- Superfund Amendments and Reauthorization Act (SARA), Title III, Sections 311, 312, and 313
- Title 29 Code of Federal Regulation (CFR) 1910.1200, Hazard Communication Standard
- Title 40 CFR 350, Trade Secrecy Claims for Emergency Planning and Community Right-To-Know Information; and Trade Secret disclosures to Health Professionals
- Title 40 CFR 355, Emergency Planning and Notification
- Title 40 CFR 370, Hazardous Chemical Reporting; Community Right-To-Know
- Title 40 CFR 372, Toxic Chemical Release Reporting; Community Right-To-Know.
- Executive Order 13148, Greening the Government Through Leadership in Environmental Management

### APPLICABILITY

This chapter is applicable to operations at Glenn Research Center (GRC) at Lewis Field and at Plum Brook Station.

### REQUIREMENTS

#### Inventory Reporting

The EPCRA requires that GRC, which prepares or has available Material Safety Data Sheets (MSDSs) for hazardous chemicals under OSHA, prepare and submit an emergency and hazardous chemical inventory form to the Ohio EPA, State Emergency Response Commission (SERC), the local emergency planning committee, and the local fire department with jurisdiction over the facility (Lewis Field or Plum Brook Station).

GRC at Lewis Field and Plum Brook Station are subject to report because they both meet the requirement of a facility that maintains hazardous chemicals in amounts above established reporting thresholds.

The U.S. EPA has published a list of extremely hazardous substances in 40 CFR Part 355 and has established a permanent threshold planning quantity for each substance on the list. The reporting thresholds currently apply to hazardous chemicals present at a facility in quantities equal to or greater than 10,000 lb or to extremely hazardous

substances present in quantities equal to or greater than 500 lb (nominally 55 gal), or the threshold planning quantity (TPQ), whichever is less.

GRC must submit the inventory forms annually by March 1<sup>st</sup> for both facilities. In compliance with EPCRA requirements, GRC reports on those hazardous chemicals or extremely hazardous substances that are present at any time during the year in quantities equal to or greater than the threshold planning quantities.

Ohio State Emergency Response Forms (Ohio EPA forms 0316 and 0317) are used by GRC to fulfill the reporting requirements for both locations.

### Emissions Reporting

The EPCRA also requires a report of emissions of toxic chemicals from facilities that manufacture, process, import, or otherwise use a listed toxic chemical above the threshold quantities. Executive Order 13148 extends this reporting requirement to federal facilities. The U.S. EPA Toxic Chemical Release Inventory Reporting Form (Form R) is used by GRC for reporting this information annually to the EPA by July 1.

## **RESPONSIBILITIES**

### Environmental Management Office (EMO)

- Submits the Emergency and Hazardous Chemical Inventory Forms to the Ohio State Emergency Response Commission, the Cuyahoga County Department of Community Services and the Brook Park Fire Department for Lewis Field, and to the Erie County Emergency Management Agency and the Perkins Township Fire Department for Plum Brook Station.
- Submits the U.S. EPA Toxic Chemical Release Inventory Form(s) to the U.S. EPA Region 5 and Ohio EPA for both Lewis Field and Plum Brook Station, as necessary.

### Chemical Management Team (CMT)

- Prepares the Emergency and Hazardous Chemical Inventory Forms for EMO to submit to the Ohio State Emergency Response Commission, the Cuyahoga County Department of Community Services, the Brook Park Fire Department for Lewis Field Inventory.
- Evaluates annual chemical usage and prepares (if necessary) the U.S. EPA Toxic Chemical Release Inventory Form(s) for EMO to submit to the U.S. EPA Region 5 and Ohio EPA for Lewis Field.
- Maintains the chemical management system database and MSDS files.

### Plum Brook Environmental Manager

- Prepares the Emergency and Hazardous Chemical Inventory Forms for EMO to submit to the Ohio State Emergency Response Commission, The Erie County Emergency Management Agency and the Perkins Township Fire Department for Plum Brook Station.
- Evaluates annual chemical usage and prepares (if necessary) the U.S. EPA Toxic Chemical Release Inventory Form(s) for EMO to submit to the U.S. EPA Region 5 and Ohio EPA for Plum Brook Station.

## **DEFINITIONS**

### Hazardous chemical

Any chemical that is a physical or health hazard as defined by OSHA 29 CFR 1910.1200, Hazard Communication Standard.

### Hazardous material

Any material defined as hazardous under 40 CFR 171.8 which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce and which has been so designated. Such material has one or more toxic, flammable, corrosive, or

reactive properties. All materials listed under Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA) are included.

#### Non-Reportable quantity (NRQ) spills

A spill that is relatively small in volume and presents low hazard potential to personnel or the environment. Containment and cleanup of trace quantities of NRQ spills are the responsibility of the user (custodian) of the material. Non-reportable quantity spills can be contained and cleaned up with only minor difficulty. Outside support is not necessary for NRQ spills.

#### Release

Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, dumping or disposing into the environment (including abandonment or discarding of barrels, containers, and other closed receptacles) of any toxic chemical.

#### Reportable quantity (RQ) spills

Spills involving large volumes of material and may present significant hazard to personnel or the environment. Any spill reportable under EPA regulations 40 CFR 302, 355, or 372 shall be considered a RQ spill. Reportable quantity spills include, but are not limited to, the materials and volumes given in Appendix B (40 CFR 355) under Extremely Hazardous Substances (EHS) RQ or CERCLA reportable quantities.

#### Threshold planning quantity (TPQ)

The quantity for an extremely hazardous substance as defined in 40 CFR 355.

### RELATED CHAPTERS

Chapter 22, Acquisition of Hazardous Chemicals and Materials

Chapter 23, Hazard Communication Policy

HAZCOM Program, Chapter 2, Chemical Inventory Plan

### RECORDS

Maintained by the Environmental Management Office for Lewis Field, Plum Brook Management Office for Plum Brook Station

- Ohio State Emergency Response Forms (Ohio EPA Forms 0316 and 0317).
- US EPA Toxic Chemical Release Inventory Reporting Form R.

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